

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

SONIA MCGAFFIGAN,

Plaintiffs,

-against-

THE CITY OF ROCHESTER, a municipal  
entity, ETHAN PASZKO, RYAN  
CASTRICHINI, DOMENIC BORRELLI,  
JEREMY ROBINSON, "JOHN DOE POLICE  
OFFICERS 1-10" (names and number of whom  
are unknown at present),

Defendants.

**NOTICE OF MOTION**

**21-cv-6545 (FPG)(MWP)**

PLEASE TAKE NOTICE that upon the annexed Declaration of Elliot D. Shields and the exhibits annexed thereto, the Declaration of David A. Roth and exhibit attached thereto, the Declaration of Donald M. Thompson and the exhibit annexed thereto, the memorandum of law, and all the pleadings and proceedings heretofore had herein, the undersigned will move this Court before the Honorable Frank P. Geraci, at the United States Courthouse, 100 State Street, Rochester, New York at a Motion Term hereof, on October 27, 2022 at 9:00 a.m., or as soon thereafter as counsel may be heard, for an order: (1) Pursuant to the 42 U.S.C. § 1988 awarding reasonable attorney's fees and costs to Plaintiff's Counsel in the amount of \$72,330.80; and (2) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Rule 7(a)(1) of the Local Rules of this Court, the Plaintiffs intend to file reply papers and therefore, pursuant to Rule 7(b)(2)(B), the Defendants are required to serve responding papers, if any, at least seven (7) days prior to the return date of this motion.

Dated: New York, New York  
October 4, 2021

Respectfully Submitted,  
ROTH & ROTH LLP

By: ~s/~  
Elliot Dolby Shields, Esq.  
*Counsel for Plaintiff*  
192 Lexington Ave, Suite 802 New  
York, New York 10016  
Ph: (212) 425-1020

To: All parties (via ECF)